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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ADRIAN SCHOOLCRAFT,  
Plaintiff,

Case No:  
10 CV 06005

- against -

THE CITY OF NEW YORK, ET AL.,

Defendants.

-----X

111 Broadway  
New York, New York

May 15, 2014  
10:28 a.m.

DEPOSITION OF SALVATORE SANGENITI, pursuant to  
Notice, taken at the above place, date and  
time, before DENISE ZIVKU, a Notary Public  
within and for the State of New York.

1 S. SANGENITI

2 respond to your corner location.

3 Q. What was your corner location?

4 A. 127th Street and 95th Avenue.

5 Q. And you would just wait there  
6 until you got a call?

7 A. Correct.

8 Q. Do you recall getting the call  
9 to respond to the Schoolcraft --

10 A. No, I don't.

11 Q. -- residence?

12 A. Sorry, I don't.

13 Q. What do you recall about that  
14 call or that job or that assignment?

15 MR. RADOMISLI: You're going to  
16 have to narrow it down.

17 Q. Do you recall going to  
18 Schoolcraft's residence?

19 A. I remember going to the  
20 assignment.

21 Q. When you went to the assignment,  
22 what was your understanding about what the  
23 assignment was about?

24 A. Just that it was an unknown  
25 condition.

1 S. SANGENITI

2 Q. Did you ever have any  
3 discussions with anybody at the scene about  
4 Officer Schoolcraft carrying or not carrying  
5 any weapons?

6 MS. PUBLICKER METTHAM:

7 Objection.

8 A. No.

9 Q. Did you ever have any  
10 discussions with anybody at the scene about  
11 Officer Schoolcraft being an emotionally  
12 disturbed person?

13 A. I'm sorry, can you just rephrase  
14 that?

15 Q. Did you ever have any  
16 discussions with anybody at the scene about  
17 Officer Schoolcraft being an EDP or an  
18 emotionally disturbed person?

19 A. I don't -- I don't designate who  
20 is an emotionally disturbed person.

21 Q. I understand that, but I'm not  
22 asking you that question. I'm asking you a  
23 slightly different question which I will try  
24 to restate it just so it's clear.

25 Did you have any conversations

1 S. SANGENITI

2 with anybody at any time during this scene  
3 or while you were at the scene of  
4 Schoolcraft's residence, either on the  
5 street or in his house, where somebody told  
6 you that Officer Schoolcraft was an  
7 emotionally disturbed person or an EDP?

8 A. Yes.

9 Q. Who told you?

10 A. Lieutenant Hanlon.

11 Q. Lieutenant Hanlon told you that.  
12 When did Lieutenant Hanlon tell you that  
13 Officer Schoolcraft was an EDP?

14 A. It was after the conversation  
15 she had with the officers.

16 Q. After what conversation she had  
17 with the officers?

18 A. At the scene of the assignment  
19 when an EMS officer is there, they are the  
20 go between for police department and the  
21 fire department.

22 Q. My question is when did Hanlon  
23 tell you that Schoolcraft was an EDP?

24 A. At the scene of the assignment.

25 Q. When at the time of the scene of

1 S. SANGENITI

2 the assignment?

3 A. I would say maybe 21 -- 21 --  
4 maybe 2200.

5 Q. What were the circumstances or  
6 what was the situation at the time that  
7 Lieutenant Hanlon told you that Officer  
8 Schoolcraft was an EDP?

9 MR. RADOMISLI: Objection to  
10 form. You could answer.

11 A. Just that he was acting  
12 irrational and based on their evaluation,  
13 that being Lieutenant Hanlon and the  
14 officers on the scene of the assignment that  
15 he is an emotionally disturbed person.

16 Q. Did she make this statement to  
17 you that Officer Schoolcraft was an EDP to  
18 you directly?

19 A. She would have to.

20 Q. No, no. I'm not asking you what  
21 could have happened or should have happened  
22 or what likely has happened. I am asking  
23 you do you have a recollection of Hanlon  
24 telling you that Schoolcraft was an EDP?

25 A. No.

1 S. SANGENITI

2 Q. So when you told me a little  
3 while ago that she did tell you that Officer  
4 Schoolcraft was an EDP, you were testifying  
5 about what you believe, but you didn't have  
6 any specific recollection of her telling you  
7 that; is that correct?

8 MR. RADOMISLI: Objection to  
9 form.

10 A. Correct.

11 Q. So I will come back to the  
12 question that originally got us down this  
13 path. Do you recall anyone at the scene,  
14 either on the street or in the apartment or  
15 in the bus or on the way to the hospital,  
16 telling you that Officer Schoolcraft was an  
17 EDP or emotionally disturbed person?

18 A. Yes.

19 Q. Who?

20 A. Lieutenant Hanlon.

21 Q. When did she tell you that?

22 MR. RADOMISLI: Asked and  
23 answered. You can answer again.

24 THE WITNESS: I'm sorry?

25 MR. RADOMISLI: Asked and

1 S. SANGENITI

2 answered, but you can answer again.

3 A. 22:00 hours approximately.

4 Q. When she said that to you, where  
5 were you standing?

6 A. In the apartment.

7 Q. And where was she standing?

8 A. In the apartment.

9 Q. Were you in the same room?

10 A. There is only one room there.  
11 We were all there.

12 Q. So Hanlon told you while you and  
13 she were standing in the room that Officer  
14 Schoolcraft was EDP?

15 A. Yes.

16 Q. Is there something in the PCR,  
17 which you were just looking at, which is  
18 relative to the inquiry I'm making to you  
19 about Hanlon telling you that Schoolcraft  
20 was an EDP?

21 MR. RADOMISLI: Objection to  
22 form.

23 A. Just trying refresh my memory.  
24 As you know, it was quite a while ago.

25 MR. SMITH: For the record the

1 S. SANGENITI

2 witness was just perusing the PCR  
3 report.

4 MR. RADOMISLI: Why?

5 MR. SMITH: Why should it  
6 reflect that, because that's a fact. I  
7 can go beyond that, but I am not  
8 choosing not to at this point.

9 Q. Why do you believe that Hanlon  
10 told you this at 2200?

11 A. 'Cause we were getting ready to  
12 transport the patient.

13 Q. How many times were you in  
14 Schoolcraft's apartment?

15 A. Just once.

16 Q. How many times was Hanlon in  
17 Schoolcraft's apartment?

18 MS. PUBLICKER METTHAM:

19 Objection.

20 A. Once.

21 Q. Other than Hanlon telling you  
22 that Schoolcraft was an EDP in the  
23 apartment, did anybody else at the scene or  
24 thereafter tell you that Schoolcraft was an  
25 EDP?



1 S. SANGENITI

2 A. Just the officer told Lieutenant  
3 Hanlon and Lieutenant Hanlon discussed it  
4 with me.

5 Q. What officer told Lieutenant  
6 Hanlon?

7 A. Blue shirt.

8 Q. Are you telling me that an  
9 officer, a blue shirt in the apartment, told  
10 Hanlon Schoolcraft is an EDP and then Hanlon  
11 told you he was an EDP?

12 MS. PUBLICKER METTHAM:

13 Objection.

14 A. I don't know what conversation  
15 they would have. I don't have privy to  
16 their conversation.

17 Q. You just told me that an officer  
18 told Hanlon that Schoolcraft was an EDP,  
19 right? Did you just tell me that?

20 A. I told you the conversation the  
21 officer had with Lieutenant Hanlon and then  
22 it was conveyed to me.

23 Q. Did you just tell me that an  
24 officer in a blue shirt told Hanlon that  
25 Schoolcraft was an EDP, you just told me

1 S. SANGENITI

2 that, right?

3 A. Yes.

4 Q. And that's the truth, right?

5 A. It is.

6 Q. Were you in the room when the  
7 officer told Hanlon that Schoolcraft was an  
8 EDP?

9 A. Yes.

10 Q. What did this officer look like?

11 A. I don't remember.

12 Q. It was a male?

13 A. Yes.

14 Q. Can you describe his ethnic  
15 background or his build or anything else  
16 about him?

17 A. No, I can't, I'm sorry.

18 Q. Can you describe the uniform  
19 that the officer was wearing?

20 A. Police department issued  
21 uniform, blue shirt.

22 Q. Did the officer have any facial  
23 hair?

24 A. I don't remember.

25 Q. Did the officer say anything

1 S. SANGENITI

2 else to Hanlon, other than that Officer  
3 Schoolcraft was an EDP?

4 MS. PUBLICKER METTHAM:

5 Objection.

6 MR. RADOMISLI: That he was  
7 able to hear?

8 MR. SMITH: Yes.

9 A. No, I wasn't privy to that.

10 Q. How much time elapsed between  
11 the time that this blue shirt officer told  
12 Hanlon that Officer Schoolcraft was an EDP  
13 and Hanlon telling you that Officer  
14 Schoolcraft was an EDP?

15 A. I really can't tell you.

16 Q. But you were in the same room  
17 when the officer had this conversation with  
18 Hanlon?

19 A. I was in the room, yes.

20 Q. You heard the officer's words  
21 spoken to Hanlon; is that correct?

22 A. No, I didn't.

23 Q. How do you know that the officer  
24 told Hanlon that Schoolcraft was an EDP?

25 A. 'Cause she couldn't make that

1 S. SANGENITI

2 decision by herself.

3 Q. All right. Did you see an  
4 officer speaking to Hanlon about  
5 Schoolcraft?

6 A. No.

7 Q. So when you told me that an  
8 officer in a blue shirt told Hanlon that  
9 Schoolcraft was an EDP, you didn't actually  
10 witness those statements?

11 A. Correct.

12 Q. You just drew a conclusion; is  
13 that correct?

14 A. Based on Lieutenant Hanlon's  
15 statement to myself, yes.

16 Q. What was Lieutenant Hanlon's  
17 statement to you, which led you to the  
18 conclusion that it was an officer wearing a  
19 blue shirt who told her that Schoolcraft was  
20 an EDP?

21 A. Based on her conversation with  
22 the officer.

23 Q. So Hanlon told you that  
24 Schoolcraft is an EDP based on what the  
25 police officer told her; is that correct?

1 S. SANGENITI

2 MS. PUBLICKER METTHAM:

3 Objection.

4 MR. RADOMISLI: Objection to  
5 form.

6 A. Based on Lieutenant Hanlon's  
7 conversation with the officer, Officer  
8 Schoolcraft was treated as such.

9 Q. Can you tell me what her words  
10 were to you?

11 A. No, I couldn't.

12 Q. Is it fair to say that the sum  
13 and substance of what she told you was that  
14 he is an EDP because the cop said so?

15 MS. PUBLICKER METTHAM:

16 Objection.

17 A. I can't speculate as to what was  
18 said. All I can tell you that what was  
19 conveyed to me.

20 Q. That's what I'm trying to get at  
21 is what was conveyed to you?

22 A. That he was an EDP, but he  
23 wasn't treated like that. He was treated as  
24 a medical patient.

25 Q. I am respectfully very, very

1 S. SANGENITI

2 confused about what you're telling me.

3 Hanlon told you that Schoolcraft was an EDP,  
4 right?

5 A. Correct.

6 Q. She told you that while you were  
7 standing in Officer Schoolcraft's bedroom;  
8 is that correct?

9 A. Correct.

10 Q. And she told you that that  
11 decision was based on her discussions with a  
12 member of the police department; is that  
13 correct?

14 A. Correct.

15 Q. And although you didn't hear the  
16 conversation between Hanlon and the police  
17 department, you saw her having conversations  
18 with members of the police department; is  
19 that correct?

20 A. I was in the same room, yes.

21 Q. And you saw Hanlon having  
22 conversations with members of the police  
23 department?

24 A. Yes.

25 Q. And was based on the fact that

1 S. SANGENITI

2 she was having conversations with members of  
3 the police department and that thereafter  
4 she told you that he was an EDP that you  
5 drew the conclusion that it was the officer  
6 who made the decision that he was an EDP; is  
7 that correct?

8 MR. RADOMISLI: Read it back.

9 MR. SMITH: You lawyer's asked  
10 the court reporter to read back the  
11 question just so you have it in mind.

12 (Record read.)

13 A. Yes.

14 Q. Other than Hanlon telling you  
15 that Officer Schoolcraft was an EDP, did  
16 anybody else in the world ever tell you at  
17 any time that Officer Schoolcraft was an  
18 EDP?

19 MR. RADOMISLI: Objection to  
20 form.

21 MS. PUBLICKER METTHAM:  
22 Objection.

23 A. My interactions with Lieutenant  
24 Hanlon, she was the only EMS officer on the  
25 scene.

1 S. SANGENITI

2 MR. SMITH: I will rephrase the  
3 question.

4 Q. Other than Hanlon, anybody else  
5 tell you Schoolcraft was an EDP?

6 A. No.

7 Q. Did you ever have any  
8 discussions with anybody at the scene about  
9 whether or not Schoolcraft was an EDP?

10 A. No.

11 MR. SMITH: All right, take a  
12 short break. It's 11:39, going off the  
13 record. Just five minutes; okay.

14 (Whereupon, a recess was taken.)

15 MR. SMITH: Going back on the  
16 record, it's 11:51.

17 Q. We were talking about the  
18 conversation you had with Hanlon about  
19 Schoolcraft being an EDP. Can you tell me  
20 what the -- let me rephrase that.

21 When Hanlon told you that, was  
22 Schoolcraft in the bedroom?

23 A. Yes.

24 Q. Was he sitting on the bed?

25 A. Yes.



1 S. SANGENITI

2 officer tell you that you're suspended,  
3 would that be the kind of thing that would  
4 elevate somebody's blood pressure?

5 MR. RADOMISLI: Objection.

6 MS. PUBLICKER METTHAM:

7 Objection.

8 A. I can't speculate on it. I'm  
9 not that person.

10 Q. No, I understand that you're not  
11 that person, but you have an enormous amount  
12 of experience taking blood pressure  
13 readings, don't you?

14 A. Yes.

15 Q. As an EMT you have probably  
16 taken tens of thousands of blood pressure  
17 readings over the past 25 years, right?

18 A. Correct.

19 Q. Given that background, can you  
20 tell me whether or not a person being told  
21 by their superior officer that they're  
22 suspended is the kind of circumstance that  
23 would lead to or could lead to an elevated  
24 blood pressure reading?

25 MS. PUBLICKER METTHAM:

1 S. SANGENITI

2 Objection.

3 MR. RADOMISLI: Objection.

4 A. It could, but what happened is  
5 that the officer told me that was his normal  
6 blood pressure.

7 Q. I'm not trying argue with you.

8 A. Nope, not at all.

9 Q. I just want you to answer my  
10 question.

11 A. Okay.

12 Q. All right. I will restate my  
13 question just so it's clear. It's my  
14 understanding that you just told me that  
15 based on your experience, if somebody is  
16 told by his superior officer that they're  
17 being suspended that those are the kind of  
18 facts that could lead to an elevated blood  
19 pressure; is that correct?

20 MS. PUBLICKER METTHAM:

21 Objection.

22 MR. RADOMISLI: Objection.

23 Substance.

24 Q. Is that correct?

25 A. Yes.

1 S. SANGENITI

2 Q. Is that correct because a  
3 person's emotional state is connected with  
4 their blood pressure readings?

5 A. It's one of the factors, yes.

6 Q. What are the other factors?

7 A. History, any medication that the  
8 individual is on, that's pretty much.

9 Q. Does the respiration rate of 20  
10 appear to be normal?

11 A. Yes. 16 to 20 would be a fair  
12 number.

13 Q. What about the pulse of 120, the  
14 first entry, that appear to be normal?

15 A. No.

16 Q. How does that appear to you?

17 A. Little high.

18 Q. What's a normal range?

19 A. 80 to probably -- 80 to 90,  
20 preferably below 80.

21 Q. After taking the initial or  
22 primary blood pressure reading from  
23 Schoolcraft, what did you do?

24 A. Discussed with him that it would  
25 be in his best interest to go to the

1 S. SANGENITI

2 hospital. He was pretty adamant as to not  
3 go to the hospital. I stated to him that  
4 with a pressure that high, you know, you're  
5 jeopardizing his own health and it would be  
6 in his best interest and he agreed.

7 Q. Did he have a right to refuse  
8 medical attention?

9 A. Sure. As long as he had  
10 decisional capacity.

11 Q. And he did have decisional  
12 capacity?

13 A. Yes, but you try to discuss with  
14 the individual that based on his medical  
15 condition it would be prudent to get it seen  
16 and take care of.

17 Q. And your advice to him was that  
18 he have his medical condition checked out,  
19 right?

20 A. Correct.

21 Q. In what way did you believe that  
22 he should be checked out medically?

23 MR. RADOMISLI: Objection.

24 A. Based on his blood pressure and  
25 other conditions, his underlying condition,

1 S. SANGENITI

2 it would be prudent to go to the emergency  
3 room.

4 Q. What would you expect the  
5 emergency room to do?

6 MR. RADOMISLI: Objection.

7 A. I can't -- they're going to  
8 treat his blood pressure.

9 Q. How are they going to treat it?

10 MR. RADOMISLI: Objection.

11 A. They can give him Lasix, they  
12 are going to give him other drugs that can  
13 assist in lowering his pressure.

14 Q. Was Schoolcraft at risk of a  
15 heart attack at this point?

16 MR. RADOMISLI: Objection.

17 A. Could he have a heart attack,  
18 yes.

19 Q. Anything's possible. What I  
20 want to know is given your experience, was  
21 Schoolcraft at risk of a heart attack at the  
22 time you took this first blood pressure  
23 reading?

24 MR. RADOMISLI: Objection.

25 A. Sure.

1 S. SANGENITI

2 Q. Why do you say that?

3 A. A pulse rate of 120 he would go  
4 into V-fib.

5 Q. What is that?

6 A. Where the heart actually pumps  
7 so fast to where it -- you have an  
8 irregularity and he could -- his heart could  
9 stop.

10 Q. Is there a protocol that you're  
11 aware of that when you take a blood pressure  
12 reading and a pulse reading that gives you  
13 numbers like these?

14 MR. RADOMISLI: Objection to  
15 form. I don't understand the question.

16 A. It there a pulse?

17 Q. Is there a protocol, I mean, is  
18 there a standard procedure that --

19 A. No.

20 Q. -- you normally follow in  
21 circumstances like this?

22 A. No.

23 Q. Isn't it advisable to tell the  
24 patient to sit down or lie down and take the  
25 blood pressure reading again?

1 S. SANGENITI

2 MR. RADOMISLI: Objection.

3 A. Well, he was sitting down.

4 Q. You're not answering my  
5 question. Isn't it standard procedure to  
6 ask a patient who gives you a blood pressure  
7 reading that you consider to be elevated to  
8 tell the person sit or lie down, relax and  
9 take the reading again in a few minutes?

10 MR. RADOMISLI: Objection.

11 Q. Isn't that standard procedure?

12 MR. RADOMISLI: Objection.

13 A. Yes.

14 Q. Why didn't you do that in this  
15 case?

16 MS. PUBLICKER METTHAM:

17 Objection.

18 A. Probably because we were -- I  
19 wanted -- I talked the individual to now go  
20 to the hospital and I didn't want to stray  
21 from getting him to the hospital. So I  
22 moved it along.

23 Q. Why did you move it along?

24 A. I wouldn't want the individual  
25 to not get care based on the situation.

1 S. SANGENITI

2 Q. Wasn't it possible that your  
3 blood pressure reading and your pulse  
4 reading and your respiration readings were  
5 incorrect?

6 MR. RADOMISLI: Anything's  
7 possible.

8 A. And not that -- he told me that  
9 it's normal for him. That's his normal  
10 blood pressure. 'Cause when I told him --  
11 I'm sorry, I didn't mean to interrupt you.

12 Q. No, that's okay. He told you  
13 that his blood pressure was normally that  
14 high?

15 A. Yes.

16 Q. And did that suggest to you that  
17 this was not an emergency situation?

18 A. Just because an individual says  
19 that that's their normal blood pressure  
20 doesn't not mean that other things are not  
21 going on. I'm not a doctor. I'm just there  
22 to evaluate and treat.

23 Q. Did you offer him any  
24 medication?

25 A. We don't carry any medication.



1 S. SANGENITI

2 Q. After you took the blood  
3 pressure reading what happened next, to your  
4 recollection?

5 A. Had a conversation with him  
6 discussing the importance of going to the  
7 emergency room and after back and forth  
8 conversations he had decided to go.

9 Q. Then what happened?

10 A. We exited the apartment. We  
11 walked down to the vehicle. He went into  
12 the back of the vehicle and when he found  
13 out that he wasn't going to North Shore  
14 Forest Hills, he ran out of the vehicle and  
15 went back into the apartment.

16 Q. How did he find out that he  
17 wasn't going to North Shore Forest Hills?

18 A. I probably discussed it with  
19 him. I told him we needed to go to the  
20 closest 911 receiving hospital.

21 Q. Which hospital was that?

22 A. Jamaica Hospital.

23 Q. How far was Forest Hills?

24 A. I don't really know exactly, but  
25 it was further.

1 S. SANGENITI

2 Q. You have no idea how much  
3 further?

4 A. No. Again, we -- when we get an  
5 assignment and hospital designation from  
6 911, it comes up with a mask. That mask  
7 tells you the closest hospitals, closest  
8 speciality hospital, the closest whatever  
9 that's designed and through the 911 system.  
10 It comes out through them.

11 Q. When you mean the speciality  
12 hospital, what do you mean?

13 A. Replant center, burn center, a  
14 psychiatric hospital.

15 Q. Forest Hills has a psychiatric  
16 unit?

17 A. No.

18 Q. Jamaica does?

19 A. Yes.

20 Q. So if the 911 system says send  
21 us to the closest hospital that has a  
22 psychiatric unit, Forest Hills at that  
23 location would be the closest hospital; is  
24 that correct?

25 MR. RADOMISLI: Objection.

1 S. SANGENITI

2 A. No, Forest Hills doesn't.

3 Q. I'm sorry, I misspoke. So if  
4 the 911 system protocol says you're looking  
5 for a hospital that has psych services, the  
6 closest hospital from the location that you  
7 were at Schoolcraft's residence was Jamaica  
8 Hospital; is that correct?

9 MR. RADOMISLI: Objection.

10 A. Correct.

11 Q. Putting aside the nature of the  
12 services, am I correct that Forest Hills and  
13 Jamaica were 911 receiving hospitals?

14 A. Yes.

15 Q. Am I correct that they were  
16 roughly the same distance from each other?

17 MR. RADOMISLI: Objection.

18 A. Probably not.

19 Q. Which one is closer?

20 A. Jamaica.

21 Q. By how much?

22 A. Approximately two miles.

23 Q. How did you measure the  
24 distance, is that by GPS, by driving mileage  
25 or how the crow flies or some other

1 S. SANGENITI

2 measurement?

3 A. How it's measured?

4 Q. Yeah. Do you know how it's  
5 measured, driving distance?

6 A. I would assume by blocks and  
7 mileage.

8 Q. You're familiar with the  
9 location where you were at, right?

10 A. Yes.

11 Q. You're familiar with where  
12 Jamaica Hospital is at, right?

13 A. Yes.

14 Q. You're familiar with where  
15 Forest Hills is at?

16 A. I am.

17 Q. Fair to say you've been to both  
18 locations many times?

19 A. I would say, yes.

20 Q. According to the PCR, you were  
21 at 82-60 88 Place and that drive to Jamaica  
22 Hospital was four miles. Do you see that on  
23 this PCR?

24 A. Yes.

25 Q. Are you telling me that the

1 S. SANGENITI

2 drive from 82-60 88th Place to Forest Hills  
3 was six miles in your estimation?

4 MR. RADOMISLI: Objection.

5 A. Four miles.

6 Q. And how long was the drive to  
7 Forest Hills?

8 MR. RADOMISLI: Objection.

9 A. Approximately seven miles.

10 Q. You're sure about that?

11 MR. RADOMISLI: Objection.

12 A. No, I am not. It's all an  
13 estimation.

14 Q. Did anybody else say anything to  
15 Schoolcraft when he got into the ambulance?

16 A. The first time or the second  
17 time?

18 Q. The first time.

19 A. No. At that time we were just  
20 sitting him on the stretcher and...

21 Q. And you told him that he was  
22 going to go to Jamaica, right?

23 A. I said we're going to take you  
24 to the closest 911, which is Jamaica.

25 Q. And he said he wanted to go to

1 S. SANGENITI

2 Forest Hills, right?

3 A. He goes I'm not going, I'm out  
4 of here and he got up, bolted and ran into  
5 the apartment.

6 Q. Did you say he bolted and ran  
7 into the apartment?

8 A. He left. He left the vehicle  
9 and proceeded to go back into the apartment.

10 Q. There is big difference in my  
11 mind between leaving the vehicle and  
12 proceeding back to the apartment and bolting  
13 and running back to the apartment. Do you  
14 recognize there's a difference --

15 A. I do.

16 Q. -- between those two things?

17 A. Bad choice of words.

18 Q. Sorry.

19 A. Bad choice of words.

20 Q. Well, which was the bad choice  
21 of words --

22 A. The bolted.

23 Q. So he didn't bolt out of the  
24 ambulance, right?

25 A. No. He left -- he exited the

1 S. SANGENITI

2 vehicle.

3 Q. He left the vehicle. Did he run  
4 to his apartment or did he walk to his  
5 apartment?

6 A. He walked fast.

7 MR. LEE: Or something else?

8 MR. SMITH: I'm sorry, what did  
9 you say?

10 MR. LEE: I said or something  
11 else.

12 Q. He didn't fly, did he?

13 A. No.

14 Q. Did he take a motorcycle?

15 A. No.

16 Q. He used his feet, right?

17 A. Yes.

18 MR. RADOMISLI: There's skipping  
19 and hopping.

20 MR. SMITH: Fine. Fair enough.

21 Q. He didn't skip or hop or gallop,  
22 did he?

23 A. No.

24 Q. So he walked quickly, is that  
25 what you said? Quick, fast?

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2 A. Brisk.

3 Q. Thank you. All right, so he  
4 briskly walked back to his apartment and you  
5 saw him briskly walking back to his  
6 apartment; is that right?

7 A. Correct.

8 Q. Did you see anybody briskly  
9 walking behind him?

10 A. The officers were following him.

11 Q. Okay, so you saw officers  
12 following Schoolcraft into the apartment?

13 A. Because at that point he was --  
14 officers were with us in the back of the  
15 vehicle.

16 Q. Who was in the vehicle with you?

17 A. It was Jessica Marquez, you  
18 know, Officer Schoolcraft and an officer who  
19 was waiting outside till once we secured the  
20 patient, that's when the officer would come  
21 with us.

22 Q. Was it normal procedure for an  
23 officer to go to the hospital under these  
24 circumstances?

25 A. They will when they're



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2 designated as an EDP.

3 Q. Well, had Schoolcraft been  
4 designated as an EDP at that time?

5 A. Sure.

6 Q. By whom?

7 A. The officers.

8 Q. So a police officer was getting  
9 into the ambulance on that first occasion  
10 when Schoolcraft was getting into the  
11 ambulance; is that right?

12 A. Well, the officer was outside  
13 and we were waiting to put him in the  
14 stretcher and you know, get him situated.

15 Q. And it was while you were  
16 getting him situated that he got up and  
17 left, right?

18 A. Correct.

19 Q. How long was Schoolcraft in the  
20 ambulance on that first occasion?

21 A. Not long. Approximately --

22 Q. Five seconds, ten seconds?

23 A. Five minutes, if that.

24 Q. What happened inside the  
25 ambulance, other than what you told me,

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2 which is that you told him you were going to  
3 take him to the nearest 911 receiving  
4 hospital Jamaica and he said I'm out of  
5 here. What else happened?

6 A. I'm not going to Jamaica. I'm  
7 going back in the house. I'm going. I  
8 don't need your help and he just left.

9 Q. Did he say I'm refusing medical  
10 attention?

11 A. He said he's refusing to go to  
12 the hospital.

13 Q. Did you do anything to  
14 Schoolcraft while he was in the ambulance?

15 A. No.

16 Q. Did Marquez do anything while he  
17 was in the ambulance?

18 A. Just try to sit him on the  
19 stretcher.

20 Q. Did you try and force him onto  
21 the stretcher?

22 MR. RADOMISLI: Objection.

23 A. No.

24 Q. Was he bound or handcuffed in  
25 any way?

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2 A. No.

3 Q. Was he restrained in any way?

4 A. No.

5 Q. Was anybody holding his arm when  
6 he was brought into the ambulance?

7 A. Just the step up.

8 Q. Just to help him to get up?

9 A. Yes.

10 Q. Who did that?

11 A. Myself.

12 Q. Did anybody take his blood  
13 pressure while he was in the ambulance?

14 A. The first time or second time?

15 Q. No, no. The first time. I'm  
16 only talking about the first when he was  
17 walking into the ambulance of his own free  
18 will?

19 A. No.

20 Q. Did anybody do anything else to  
21 assess him medically while he was in the  
22 ambulance?

23 A. No. It was too short of a time.

24 Q. So is there anything else that  
25 happened in the ambulance on that first

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2 occasion?

3 A. No.

4 Q. Do you recall Lieutenant Hanlon  
5 being at the scene at the time that  
6 Schoolcraft went into the ambulance?

7 A. Yes.

8 Q. Do you recall her saying  
9 anything?

10 A. I'm sorry, I don't know exactly  
11 what you're trying to --

12 Q. I'm really just asking do you  
13 recall her saying or doing anything?

14 MR. RADOMISLI: At the  
15 ambulance?

16 MR. SMITH: Yeah.

17 A. No.

18 Q. After Schoolcraft left the  
19 ambulance, did you see Hanlon do anything?

20 A. She said stay here and you know,  
21 let PD handle it.

22 Q. Then what did she do?

23 A. What did I do?

24 Q. No, no. What did Hanlon do?

25 A. She stood there with me. She

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2 wasn't go into the scene either.

3 Q. Into what scene?

4 A. Where they went back into the  
5 apartment.

6 Q. You stayed on the street, right?

7 A. Correct.

8 Q. And Marquez stayed on the  
9 street; is that right?

10 A. Correct.

11 Q. And Hanlon stayed on the street,  
12 right?

13 A. Correct.

14 Q. And a whole bunch of the  
15 officers went back into the apartment?

16 A. They asked for the chair. We  
17 gave them the stair chair. Timeframe I  
18 couldn't tell you. It was approximately  
19 five, ten minutes later Officer Schoolcraft  
20 was in the chair, handcuffed and he was now,  
21 you know, getting ready to be put in my  
22 vehicle.

23 Q. And he was then put in the  
24 vehicle?

25 A. Yes.

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2 Q. And was he then handcuffed to  
3 the stretcher?

4 A. He was.

5 Q. Was his blood pressure taken  
6 then?

7 A. Let's see --

8 Q. We can read all the documents --

9 A. Yeah, it was.

10 Q. -- till we're blue in the face.  
11 I want to know whether or not you remember  
12 his blood pressure being taken when he was  
13 put in the ambulance on the second occasion?

14 MR. RADOMISLI: That wasn't what  
15 your question was. The question was  
16 what was done, so he's referring to the  
17 records.

18 MR. SMITH: Fair enough.

19 MR. RADOMISLI: If you're asking  
20 him what you recall --

21 MR. SMITH: Yeah, all right. I  
22 will ask him a different question.

23 Q. I know what the document says  
24 and so do you. What I want to know, like I  
25 said before, is what do you remember about

1 S. SANGENITI

2 him having his blood pressure taken on that  
3 second time he was in the ambulance, this  
4 time handcuffed to the gurney?

5 MR. RADOMISLI: Objection to  
6 form.

7 A. And again, I wouldn't be in the  
8 rear of the vehicle. At that point I would  
9 shut the vehicle doors and take the person  
10 to the hospital.

11 Q. So you didn't see him when he  
12 was put in the vehicle, right?

13 A. I was there when we -- he was  
14 put in the vehicle, sure.

15 Q. You didn't see Marquez take a  
16 blood pressure reading for a second time?

17 A. Not for the second time, no.

18 Q. Did you ever at any time see her  
19 take a second reading?

20 A. No.

21 Q. When you saw Schoolcraft coming  
22 out of the apartment in the stair chair,  
23 what was his demeanor?

24 A. Agitated, yelling.

25 Q. Anything else?

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2 don't remove the handcuffs.

3 Q. After he was cuffed to the  
4 stretcher or the gurney, what happened next?

5 A. We closed the door and proceeded  
6 to go take him to the hospital.

7 Q. Who was in the ambulance?

8 A. It would have to be -- I can't  
9 speculate -- I don't remember. I know that  
10 it was an officer and Jessica Marquez.

11 Q. So they were in the back of the  
12 bus and you were driving; is that right?

13 A. Yes.

14 Q. Did you go with lights flashing  
15 and sirens blaring?

16 A. No.

17 Q. Why not?

18 A. New York State Department of  
19 Health does not let you -- DMV actually does  
20 not let you.

21 Q. I thought you had a potential  
22 emergency situation. So can you explain to  
23 me why you wouldn't be going back to the  
24 hospital under those circumstances?

25 A. Based on his blood pressure and



1 S. SANGENITI

2 his statement that that was his normal blood  
3 pressure, he's considered a stable patient  
4 at that point.

5 Q. I see. So the regulations that  
6 you were just referring to state that if  
7 somebody is considered a stable patient you  
8 can't use lights and sirens?

9 A. Correct.

10 Q. So when Schoolcraft was put in  
11 the ambulance he was considered a stable  
12 patient?

13 A. Yes.

14 Q. And he was considered a stable  
15 patient by you?

16 A. Yes.

17 Q. Was there somebody who was  
18 responsible for making the determination  
19 whether or not the patient is stable or not  
20 stable?

21 A. It would be the highest medical  
22 authority on the scene.

23 Q. And who was that?

24 A. It would be Lieutenant Hanlon.  
25 She's a paramedic.

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2 Q. Is there something on the PCR  
3 that reflects that he was in stable  
4 condition at the time he was put in the  
5 ambulance?

6 MR. RADOMISLI: Other than what  
7 he already testified to?

8 MR. SMITH: Yeah, other than  
9 whatever else is in the PCR, but I am  
10 not sure that's clear. So maybe you  
11 want to do that. Let me rephrase the  
12 question.

13 Q. Is there anything in the PCR  
14 that suggests to you that Schoolcraft was  
15 classified as a stable patient at the time  
16 he was being taken to Jamaica Hospital?

17 MR. RADOMISLI: Objection to  
18 form.

19 A. Based on EMT Marquez' narrative  
20 on his condition, it would warrant it being  
21 considered a stable patient.

22 Q. What is it about her narrative  
23 that --

24 A. Alert and oriented times three  
25 -- I'm sorry, not times three. Alert and

1 S. SANGENITI

2 oriented. He denied taking any medicines,  
3 his vitals again, were his normal, he denied  
4 any negative chest pain, he had good pulse,  
5 motor sensory. That would be considered a  
6 stable patient.

7 Q. Where does it say the vitals  
8 were normal?

9 A. Vitals weren't normal.

10 Q. Oh, I thought you said --

11 A. No, his vitals were normal for  
12 him. That was his statement.

13 Q. Does it make a reference to his  
14 statement that his vitals were normal for  
15 him?

16 A. No. Doesn't state it in the PCR.

17 Q. Other than the narrative, is  
18 there some other indication or box or check  
19 or a mark that suggests that Schoolcraft was  
20 deemed to be in stable condition when he was  
21 being taken to Jamaica?

22 MR. RADOMISLI: Objection to  
23 form.

24 A. Well, patent airway, his  
25 breathing was normal, lung sounds were

1 S. SANGENITI

2 clear. These vitals were posed to me they  
3 would be considered normal.

4 Q. So all of the indications on  
5 page 1 of the PCR relating to airway,  
6 breathing, circulation, pupils and the  
7 Glasgow. Those are all indications that  
8 he's in stable condition, right?

9 A. Yes.

10 Q. Is there anything on the first  
11 page that indicates that he is in anything  
12 but a stable condition?

13 A. No.

14 Q. What do the transportation  
15 regulations that you were referring to  
16 earlier about when you're allowed and not  
17 allowed to use the lights and sirens to  
18 return a patient to a hospital?

19 A. They -- New York State --  
20 actually New York City Fire Department has a  
21 procedure out for patients that are in  
22 stable condition as to use of lights and  
23 sirens.

24 Q. What is that regulation called?

25 A. It's the use of lights and

1 S. SANGENITI

2 sirens in an emergency mode.

3 Q. And those regulations govern  
4 your operation of the Jamaica bus?

5 MR. RADOMISLI: Objection to  
6 form.

7 A. Of all ambulances within, you  
8 know, within New York City.

9 Q. Including Jamaica ambulances?

10 A. Everyone.

11 Q. Are there other fire department  
12 regulations that govern the way a Jamaica  
13 EMT conducts his or her duties as an EMT?

14 MR. RADOMISLI: Objection.

15 A. They have the rules and  
16 regulations that every voluntary hospital  
17 that needs to abide by.

18 Q. And if I want to get my hands on  
19 those rules and regulations, where would I  
20 go?

21 A. You would probably have to have  
22 to go through the City Law Department.

23 Q. Did you hear any of the  
24 conversation, if any, that was had in the  
25 ambulance between or among anybody in the

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2 ambulance during the ride to the hospital?

3 A. No, I wouldn't be able to hear  
4 anything.

5 Q. You couldn't?

6 A. Couldn't. There's a partition.

7 Q. When you got to the destination,  
8 did you hear any conversation that anybody  
9 had pertaining to Schoolcraft?

10 A. No.

11 Q. So after you got to the  
12 destination what did you do?

13 A. Backed into the ER bay, opened  
14 the back and moved Officer Schoolcraft, took  
15 him over to the ER triage. Had him  
16 evaluated. I took the stretcher back, put  
17 it into the ambulance and prepared myself to  
18 go home.

19 Q. Was Schoolcraft in custody when  
20 he was brought to the hospital?

21 MR. RADOMISLI: Objection.

22 A. He was.

23 Q. And was he left in custody by  
24 the police department when you left?

25 MR. RADOMISLI: Objection.

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2 attention from the other room while you were  
3 inside the bedroom?

4 A. Yes.

5 Q. Had she been speaking with other  
6 officers who were in that other room just  
7 before she called out your name Sal, Sal?

8 MR. KRETZ: Objection.

9 MR. RADOMISLI objection.

10 A. Yes.

11 Q. What's your understanding of  
12 why she was trying to get your attention at  
13 that moment when you were taking or had just  
14 taken his blood pressure?

15 MR. RADOMISLI: Objection.

16 MS. PUBLICKER METTHAM:

17 Objection.

18 A. I don't know. I wasn't privy to  
19 that.

20 Q. Well, you responded to that --

21 A. Well, I have because she was  
22 my...

23 Q. I know. What I want to know is  
24 I want to understand what is it that you  
25 were conveying back to her when you said

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2 A. Not really. Whatever was said  
3 on the tape that he had a headache and he  
4 was wasn't feeling well.

5 Q. Did he tell you whether he had  
6 taken any medication for his headaches?

7 A. Just the Nyquil.

8 Q. Did plaintiff ever tell you that  
9 he had chest pains?

10 A. No.

11 Q. Did anyone from the NYPD ever  
12 tell you that plaintiff complained of chest  
13 pains?

14 A. No.

15 Q. Did plaintiff complain about any  
16 sinus problems?

17 A. No.

18 Q. Did you believe plaintiff to be  
19 a danger to himself at any point?

20 A. No.

21 Q. Did you personally fill out any  
22 paperwork as a result of this call?

23 A. No.

24 Q. Did you review any documents  
25 prior to going to plaintiff's apartment on